

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

)	
In re:)	Chapter 11 (Subchapter V)
)	
FREE SPEECH SYSTEMS LLC,)	Case No. 22-60043 (CML)
)	
Debtor)	
)	
)	
In re:)	Chapter 11
)	
ALEXANDER E. JONES,)	Case No. 22-33553 (CML)
)	
Debtor)	
)	

EXHIBIT 22

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: FREE SPEECH SYSTEMS, LLC, Debtor.	§ Chapter 11 § § § § Case No. 22-60043 §
---	---

**ALEXANDER JONES' MOTION FOR ALLOWANCE AND PAYMENT OF
ADMINISTRATIVE EXPENSES PURSUANT TO 11 U.S.C. § 503(B)(1)**

TO THE HONORABLE CHRISTOPHER M. LOPEZ,
UNITED STATES BANKRUPTCY JUDGE:

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY

Alexander E. Jones (“Jones”), as a creditor and party in interest in the above-captioned Chapter 11 Case, hereby submits this motion (the “Motion”) pursuant to Section 503(b) of the United States Bankruptcy Code (the “Code”). In support of this Motion, Jones respectfully represents as follows:

I. JURISDICTION

1. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334(b). This matter is a core proceeding and this Application is proper in this district pursuant

to 28 U.S.C. §§ 1408 and 1409.

2. The statutory basis for the relief requested herein is Section 503(b) of the Code.

II. BACKGROUND

3. Jones hosts a syndicated radio and video talk show in Austin, Texas. Free Speech Systems, LLC (“FSS”) is a single member LLC, 100% owned by Jones, that produces and syndicates much of the show. In addition, FSS offers high-end dietary supplement products, books, t-shirts, and other products, which are solely promoted and advertised by Jones during his radio and streaming video talk shows, for online sale to customers at the Infowars web site.

4. FSS filed for Chapter 11 Bankruptcy under Subchapter V in the Southern District of Texas Bankruptcy Court, Houston Division, Case No. 22-60043 (the “FSS Bankruptcy Case”) on July 29, 2022; and Jones filed his own Chapter 11 Bankruptcy case, Case No. 22-33553 (the “Jones Bankruptcy Case”) on December 2, 2022.

5. As of the filing of the FSS Bankruptcy Case and the Jones Bankruptcy Case, FSS and Jones were parties to an Employment Agreement dated April 14, 2022 (the “Employment Agreement”)¹. Under the terms of the Employment Agreement, Jones agreed to produce his show on FSS’s platform in exchange for an annual salary of One Million, Three Hundred Thousand Dollars and NO/100 (\$1,300,000.00).

6. In or about August 2022, FSS ceased paying Jones his full compensation owed under the Employment Agreement, reducing his bi-weekly compensation from \$50,000.00 to \$20,000.00² (a 60% reduction). This payment reduction resulted in a claim of \$290,000.00 by

¹ True and correct copies of the Employment Agreement available upon request.

² Jones was paid only \$10,000 per pay period under the *Interim Order Authorizing Debtor’s Use of Cash Collateral and Providing Partial Adequate Protection* (the “Interim Cash Collateral Order”) (Doc. No. 41). Jones’ salary was increased to \$20,000 per pay period in the Second *Interim Order Authorizing Debtor’s Use of Cash Collateral and Providing Partial Adequate Protection* (Doc. No. 98).

Jones against FSS as of December 2, 2022, and an ongoing claim accrual of \$30,000.00 per month since then based upon Jones' current compensation rate (as Jones has performed as agreed under the Prior Employment Agreement). The current post-petition total due and owing to Jones by FSS under the Employment Agreement as of May 31, 2023, is **\$680,000.00** (the "Administrative Claim").³

7. While FSS and Jones continue to work together going forward and have negotiated the terms of an updated employment contract, each working with and through their own separate counsel, this process is not yet completed due to the informal objections by the Committee to a long-term contract. As of the date hereof, Jones and FSS continue to work with the Committee to reach an agreement on an interim compensation increase and either that agreement or a motion to approve the next employment agreement between Jones and FSS will be filed in short order. The above referenced claim is based upon the existing Employment Agreement.

III. RELIEF REQUESTED AND BASIS THEREFORE

8. Bankruptcy Code section 503(b)(1)(A) provides that: "After notice and a hearing, there shall be allowed, administrative expenses, other than claims allowed under § 502(f) of this title, including ... the actual, necessary costs and expenses of preserving the estate." 11 U.S.C. § 503(b)(1)(A).

9. In the period prior to assumption or rejection, the non-debtor party to an executory contract is required to perform, but the contract is unenforceable as against the debtor until assumption. *See, e.g., NLRB v. Bildisco*, 465 U.S. 513, 532 (1984). Nonetheless, "[i]f the debtor-in-possession elects to continue to receive benefits from the other party to an executory contract pending a decision to reject or assume the contract, *the debtor-in-possession is obligated to pay*

³If Jones' salary is not approved to be increased as of June, 1, 2023, and is paid at current rate, then the Administrative Claim will continue to accrue an additional \$30,000.00 per month.

for the reasonable value of those services....” Id. at 531 (emphasis added).

10. The services provided to FSS by Jones under the Employment Agreement have conferred a post-petition benefit on the FSS estate by ensuring FSS is able to continue to broadcast a show and sell products. Jones’ services ensure FSS operations continue and maintain their going-concern value. Indeed, FSS’ CRO has stated that when Jones does not broadcast his show, FSS endures much lower revenue from sales, causing a dip in its enterprise value.

11. Accordingly, Jones is entitled to an administrative claim pursuant to 11 U.S.C. §§ 503(b)(1)(A) and 507(a)(2). A prima facie case under Section 503(b)(1) may be established by evidence that (1) the claim arises from a transaction with the debtor-in-possession; and (2) the goods or services supplied enhanced the ability of the debtor-in-possession’s business to function as a going concern. *Matter of TransAmerican Natural Gas Corp.*, 978 F.2d 1409 (5th Cir. 1992); *In re Coastal Carriers Corp.*, 128 B.R. 400, 403 (Bankr. D. Md. 1991); *Kimzey v. Premium Casing Equipment, LLC*, Civ. A. No. 16-CV-01490, 2018 WL 1321971, at *4 (W.D. La. March 14, 2018).

12. The Administrative Claim arises from the Employment Agreement (a transaction with FSS), and the services supplied by Jones certainly enhance the ability of FSS to function as a going concern. In fact, it can be safely said that FSS would not be able to function as a going concern without the services supplied by Jones. Thus, a prima facie case under Section 503(b)(1) is established.

13. The question of whether the estate has benefited is not limited to a dollars and cents calculation. *TransAmerican*, 978 F.2d at 1420. The purpose of the priority treatment afforded by Section 503 is to encourage third parties to provide necessary goods and services to the debtor-in-possession so that it can continue to conduct its business, thus generating funds from which prepetition creditors can be paid. *Id.* Although the estate receives a benefit that can generally be

measured by the actual cost of necessary goods or services supplied, the estate also receives other less readily calculable benefits, such as the ability to continue to conduct business as usual. *Id.*; see also *In re Coastal Carriers*, 128 B.R. at 404; *Kimzey*, 2018 WL 1321971 at *3. Again, the value provided by Jones' services to FSS more than meet the stated metric. Jones' continued participation in the show production and product sales allows FSS to continue to conduct business as usual.

14. Finally, Jones would request that the Court direct FSS to pay the Administrative expense immediately, as it is able. These funds would be very helpful in paying time sensitive administrative expenses in the Jones Bankruptcy Case. Furthermore, directing a debtor to pay administrative expenses prior to plan confirmation is at the discretion of the Court. See *In re Austin*, No. 85-40639, 1994 WL 245224, at *1 (Bankr. S.D. Ga. Feb. 8, 1994) ("the time of payment of ... administrative expenses ... is entirely within the discretion of the bankruptcy court"); *In re Dakota Indus., Inc.*, 31 B.R. 23, 26 (D. S.D. 1983) ("There is no restriction on the debtor's paying administrative claims prior to confirmation of the plan in a Chapter 11 case...."); *In re Isis Foods, Inc.*, 27 B.R. 156, 157-58 (W.D. Mo. 1982) (affirming bankruptcy court order that debtor make immediate payment on administrative expense claims). Therefore, to the extent there are funds available, FSS should be compelled to make immediate payment to Jones on account of the Administrative Claim.

WHEREFORE, Jones respectfully requests that the Court enter an order allowing the Administrative Claim in an amount of not less than \$680,000.00, directing FSS to immediately pay Jones the Administrative Claim, and granting Jones such other and further relief as may be just and proper.

IV. NOTICE

15. Notice of this Motion has been provided to: (a) the Offices of the United States Trustee; (b) the Sub V Trustee; (c) Debtor's 20 largest unsecured creditors; (d) the Debtor's secured lenders; (e) any notices of appearance. Jones submits the above notice is sufficient and that no further notice is necessary.

Dated: July 6, 2023.

CROWE & DUNLEVY, P.C.

By: /s/ Christina W. Stephenson

Vickie L. Driver

State Bar No. 24026886

Christina W. Stephenson

State Bar No. 24049535

2525 McKinnon St., Suite 425

Dallas, TX 75201

Telephone: 737.218.6187

Email: dallaseservice@crowedunlevy.com

-and-

Shelby A. Jordan

State Bar No. 11016700

S.D. No. 2195

Antonio Ortiz

State Bar No. 24074839

S.D. No. 1127322

JORDAN & ORTIZ, P.C.

500 North Shoreline Blvd., Suite 900

Corpus Christi, TX 78401

Telephone: (361) 884-5678

Facsimile: (361) 888-5555

Email: sjordan@jhwclaw.com

aortiz@jhwclaw.com

Copy to: cmadden@jhwclaw.com

ATTORNEYS FOR ALEXANDER E. JONES

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was served upon the parties via e-mail, and/or electronic transmission via the Court's ECF noticing system on this 6th day of July, 2023.

/s/ Christina W. Stephenson
Christina W. Stephenson

Label Matrix for local noticing 0541-4 Case 22-60043 Southern District of Texas Houston Thu Jul 6 14:47:59 CDT 2023	Ally Bank, c/o AIS Portfolio Services, LLC 4515 N Santa Fe Ave. Dept. APS Oklahoma City, OK 73118-7901	Free Speech Systems LLC 3019 Alvin Devane Blvd. STE 300 Austin, TX 78741-7417
Official Committee of Unsecured Creditors of c/o Marty L. Brimmage, Jr. Akin Gump Strauss Hauer & Feld LLP 2300 N. Field Street, Suite 1800 Dallas, TX 75201-4675	PQPR Holdings Limited, LLC c/o Streusand Landon Ozburn & Lemmon LLP attn: Stephen Lemmon 1801 S. Mopac Expressway Suite 320 Austin, TX 78746-9817	Reeves Law, PLLC 702 Rio Grande St., Ste. 203 Austin, TX 78701-2720
Security Bank of Crawford P.O. Box 90 Crawford, Tx 76638-0090	Shannon & Lee LLP 700 Milam Street, STE 1300 Houston, TX 77002-2736	Texas Comptroller of Public Accounts, Revenue Christopher J. Dylla P.O. Box 12548 Austin, TX 78711-2548
Travis County c/o Jason A. Starks P.O. Box 1748 Austin, TX 78767-1748	US Trustee Office of the US Trustee 515 Rusk Ave Ste 3516 Houston, TX 77002-2604	4 United States Bankruptcy Court PO Box 61010 Houston, TX 77208-1010
ADP Total Source Insurance 10200 Sunset Drive Miami, FL 33173-3033	ADP TotalSource Payroll 10200 Sunset Drive Miami, FL 33173-3033	AT&T PO Box 5001 Carol Stream, IL 60197-5001
AWIO Web Services LLC 6608 Truxton Ln Raleigh, NC 27616-6694	Addshoppers, Inc 222 S. Church Street , #410M Charlotte, NC 28202-3213	Airco Mechanical, LTD PO Box 1598 Round Rock, TX 78680-1598
Alex E. Jones c/o Jordan & Ortiz, P.C. Attn: Shelby Jordan 500 North Shoreline Blvd, STE 900 Corpus Christi, TX 78401-0658	Alex Emeric Jones c/o Jordan & Ortiz, P.C. Attention: Shelby Jordan 500 N. Shoreline Blvd., Suite 900 Corpus Christi, TX 78401-0658	Ally Auto PO Box 9001948 Louisville, KY 40290-1948
Amazon Marketplace Amazon Payments, Inc. 410 Terry Ave N. Seattle, WA 98109-5210	Amazon Web Services 410 Terry Avenue North Seattle, WA 98109-5210	American Express PO Box 650448 Dallas, TX 75265-0448
American Express National Bank c/o Becket and Lee LLP PO Box 3001 Malvern PA 19355-0701	American Media/Reality Zone PO Box 4646 Thousand Oaks, CA 91359-1646	Andrews, Christopher 210 N. Beyer Stree Marion, TX 78124-4014
Atomial, LLC 1920 E. Riverside Drive Suite A-120 #124 Austin, TX 78741-1350	Auriam Services, LLC c/o Lynn Hamilton Butler Husch Blackwell LLP 111 Congress Avenue, Suite 1400 Austin, TX 78701-4093	Balcones Recycling Inc. PO Box 679912 Dallas, TX 75267-9916

Biodec, LLC
901 S. Mopac Expressway, Building 4, Ste
Austin, TX 78746-5776

Blott, Jacquelyn
200 University Boulevard
Suite 225 #251
Round Rock TX 78665-1096

Brennan Gilmore
c/o Civil Rights Clinic
ATTN: Andrew Mendrala
600 New Jersey Avenue, NW
Washington, DC 20001-2022

Campco
4625 W. Jefferson Blvd
Los Angeles, CA 90016-4006

Carlee Soto Parisi
c/o Ryan Chapple
303 Colorado Street, Suite 2850
Austin TX 78701-0137

Carlos Soto
c/o Ryan Chapple
303 Colorado Street, Ste. 2850
Austin, TX 78701-0137

Chelsea Green Publishing
85 North Main Street Ste 120
White River Junction, VT 05001-7135

Christopher Sadowski
c/o Copycat Legal PLLC
3111 N. University Drive Ste. 301
Coral Springs, FL 33065-5058

City of Austin
c/o Austin Energy
4815 Mueller Blvd.
Austin, TX 78723-3573

Cloudflare, Inc
Dept LA 24609
Pasadena, CA 91185-4609

Comptroller of Public Accounts
C/O Office of the Attorney General
Bankruptcy - Collections Division MC-008
PO Box 12548
Austin TX 78711-2548

Constant Contact, Inc.
1601 Trapelo Road
Watham, MA 02451-7357

CustomTattoNow.com
16107 Kensington Dr #172
Sugar Land, TX 77479-4224

David Icke Books Limited
c/o Ickonic Enterprises Limited
St. Helen's House King Street
Derby DE1 3EE
United Kingdom

David Wheeler
c/o Ryan Chapple
303 Colorado Street, Suite 2850
Austin TX 78701-0137

(p)DE LAGE LANDEN FINANCIAL
ATTN LITIGATION & RECOVERY
1111 OLD EAGLE SCHOOL ROAD
WAYNE PA 19087-1453

Deese, Stetson
328 Greenland Blvd. #81
Death Valley, CA 92328-9600

DirectTV
PO Box 5006
Carol Stream, IL 60197-5006

Dona Soto
c/o Ryan Chapple
303 Colorado Street, Suite 2850
Austin TX 78701-0137

EPS, LLC
17350 State Hwy 249, Ste 220, #4331
Houston, TX 77064-1132

ERM Protect
800 South Douglas Road, Suite 940N
Coral Gables, FL 33134-3125

Edgecast, Inc.
Dept CH 18120
Palatine, IL 60055-0001

Elevated Solutions Group
28 Maplewood Drive
Cos Cob, CT 06807-2601

Erica Lafferty
c/o Joseph Mirrione
27 Elm Street
New Haven, CT 06510-2087

Estate of Marcel Fontaine
Chamberlain Hrdlicka
attn? Jarrod B. Martin
1200 Smith, Suite 1400
Houston TX 77002-4496

FW Robert Broadcasting Co
2730 Loumor Ave
Metairie, LA 70001-5425

Francine Wheeler
c/o Ryan Chapple
303 Colorado Street
Suite 2850
Austin, TX 78701-0137

Frost Insurance Agency
401 Congress Avenue, 14th Floor
Austin ,TX 78701-3793

Gabriela Tolentino
5701 S Mopac Expy
Austin, TX 78749-1464

Getty Images, Inc
PO Box 953604
St. Louis, MO 63195-3604

Gracenote
29421 Network Place
Chicago, IL 60673-1294

Greenair, Inc
23569 Center Ridge Road
Westlake, OH 44145-3642

Haivision Network Video
Deot CH 19848
Palatine, IL 60055-9848

Ian Hockley
Ryan Chapple
303 Colorado Street
Suite 2850
Austin, TX 78701-0137

Impact Fire Services, LLC
PO Box 735063
Dallas, TX 75373-5063

Independent Publishers Group
PO Box 2154
Bedford Park, IL 60499-2154

Iron Mountain, Inc
PO Box 915004
Dallas, TX 75391-5004

JCE SEO
6101 Broadway
San Antonio, TX 78209-4561

JW JIB Productions, LLC
2921 Carvelle Drive
Riviera Beach, FL 33404-1855

Jacqueline Barden
c/o Ryan Chapple
303 Colorado Street, Suite 2850
Austin TX 78701-0137

Jennifer Hensel
c/o Ryan Chapple
303 Colorado Street, Suite 2850
Austin TX 78701-0137

Jeremy Richman
c/o Koskoff Koskoff & Bieder
350 Fairfield Ave
Bridgeport, CT 06604-6014

Jillian Soto-Marino
c/o Ryan Chapple
303 Colorado Street, Suite 2850
Austin TX 78701-0137

Justin Lair
1313 Lookout Ave
Klamath Falls, OR 97601-6533

KI4U.com
212 Oil Patch Lane
Gonzales, TX 78629-8028

LIT Industrial
1717 McKinney Ave #1900
Dallas, TX 75202-1253

Larry Klayman, Esq.
7050 W. Palmetto Park Rd
Boca Raton, FL 33433-3426

Leonard Pozner
c/o Chamberlain Hrdlicka
attn: Jarrod B. Martin
1200 Smith, Suite 1400
Houston TX 77002-4496

Lincoln-Remi Group, LLC
1200 Benstein Rd.
Commerce Twp., MI 48390-2200

Logo It, LLC
820 Tivy Street
Kerrville, TX 78028-3654

Lumen/Level 3 Communications
PO Box 910182
Denver, CO 80291-0182

MRJR Holdings, LLC
PO Box 27740
Las Vegas, NV 89126-7740

MVD Entertainment Group
203 Windsor Rd
Pottstown, PA 19464-3405

Magento
PO Box 204125
Dallas, TX 75320-4105

Mark Barden
c/o Ryan Chapple
303 Colorado Street, Suite 2850
Austin Tx 78701-0137

Microsoft Bing Ads
c/o Microsoft Online, Inc.
P.O. Box 847543
1950 N Stemmons Fwy, Ste 5010
Dallas, TX 75207-3199

Miller, Sean
PO Box 763
Wyalusing, PA 18853-0763

Music Videos Distributors
203 Windsor Rd
Pottstown, PA 19464-3405

Neil Heslin
c/o Chamberlain Hrdlicka
Attn: Jarrod B. Martin
1200 Smith, Suite 1400
Houston TX 77002-4496

NetSuite Inc
Bank of America Lockbox Services
Chicago, IL 60693-0001

New Relic 188 Spear Street, Suite 1200 San Francisco, CA 94105-1752	Newegg.com 9997E. Rose Hills Road Whittier, CA 90601	Nicole Rockley c/o Ryan Chapple 303 Colorado Street, Suite 2850 Austin TX 78701-0137
One Party America, LLC 6700 Woodlands Parkway, Suite 230-309 The Woodlands, TX 77382-2575	Orkin, Inc. 5810 Trade Center Drive, Suite 300 Austin, TX 78744-1365	PQPR Holdings Limited, LLC c/o Stephen Lemmon 1801 S. Mopac Expressway Suite 320 Austin, TX 78746-9817
Pattison Law Firm, P.C. 501 IH-35 Austin, TX 78702-3229	Payarc 411 West Putnam Avenue, Ste 340 Greenwich, CT 06830-6291	Paymentus 18390 NE 68th St Redmond, WA 98052-5057
Paz Law, LLC 1021 Orange Center Road Orange, CT 06477-1216	Percision Oxygen 13807 Thermal Dr Austin, TX 78728-7735	Perfect Imprints.com 709 Eglin Pkwy NE Fort Walton Beach, FL 32547-2527
Perkins, Wes General Delivery Lockhart, TX 78644-9999	Pipe Hitters Union, LLC PO Box 341194 Austin, TX 78734-0020	Post Hill Press, LLC 8115 Isabella Lane, Ste. 4 Brentwood, TN 37027-9110
Poulsen, Debra 112 Eames St. Elkhorn, WI 53121-1228	Power Reviews, Inc. 1 N. Dearborn Street Chicago, IL 60602-4331	Precision Camera 2438 W Anderson Ln Austin, TX 78757-1149
Private Jets, LLC 1250 E. Hallandale Beach Blvd, Suite 505 Hallandale, FL 33009-4635	Protection 1 Alarm PO Box 219044 Kansas City, MO 64121-9044	Public Storage 2301 E. Ben White Blvd Austin, TX 78741-7110
Pullman & Comley, LLC 850 Main Street Bridgeport, CT 06604-4988	Randazza Legal Group, PLLC 2764 Lake Sahara Drive, Suite 109 Las Vegas, NV 89117 702-420-2001 ecf@randazza.com 89117-3400	RatsMedical.com c/o Rapid Medical 120 N Redwood Rd North Salt Lake, UT 84054-2792
Ready Alliance Group, Inc PO Box 1709 Sandpoint, ID 83864-0901	Reeves Law, PLLC Attn: Bradley Reeves 702 Rio Grande St., Suite 203 Austin, TX 78701-2720	Renaissance PO Box 8036 Wisconsin Rapids, WI 54495-8036
Restore America PO Box 147 Grimsley, TN 38565-0147	Richard Coan, Chapter 7 Trustee for Debtor, Erica Laff c/o Eric Henzy 10 Middle Street Bridgeport, CT 06604-4257	Robert Parker c/o Ryan Chapple 303 Colorado Street, Suite 2850 Austin TX 78701-0137

SLNT

30 N Gould St, Ste 20647
Sheridan, WY 82801-6317

Scarlett Lewis
c/o Chamberlain Hrdlicka
Attn: Jarrod B. Martin
1200 Smith, Suite 1400
Houston TX 77002-4496

Security Bank of Crawford
6688 North Lone Star Parkway
PO Box 90
Crawford, TX 76638-0090

Simon & Schuster
PO Box 70660
Chicago, IL 60673-0660

SintecMedia NYC, Inc. DBA Operative
PO Box 200663
Pittsburgh, PA 15251-2662

Skousen, Joel
PO Box 565
Spring City, UT 84662-0565

Skyhorse Publishing
307 West 36th Street, 11th Floor
New York, NY 10018-6592

Sparkletts & Sierra Springs
PO Box 660579
Dallas, TX 75266-0579

Spectrum Enterprise aka Time Warner Cable
1600 Dublin Road
Columbus, OH 43215-2098

Stamps.com
1990 E Grand Ave.
El Segundo, CA 90245-5013

Stone Edge Technologies, Inc
660 American Avenue, Suite 204
King of Prussia, PA 19406-4032

Stratus Technologies
5 Mill & Main Place, Suite 500
Maynard, MA 01754-2660

Studio 2426, LLC
1920 E. Riverside Drive, Suite A120, i&½
Austin, TX 78741-1350

Synergy North America, Inc
11001 W. 120th Avenue, Suite 400
Broomfield, CO 80021-3493

TD Canada Trust
421 7th Avenue SW
Calgary, AB T2P 4K9, Canada

Texas Comptroller
PO Box 13003
Austin, TX 78711-3003

Texas Disposal Systems, Inc
PO Box 674090
Dallas, TX 75267-4090

Texas Gas Service
PO Box 219913
Kansas City, MO 64121-9913

Textedly
133 N. Citrus Ave., Suite 202
Los Angeles, CA 90036

The Creative Group
c/o Robert Half
2884 Sand Hill Road, Ste 200
Menlo Park, CA 94025-7072

The Hartford
PO Box 14219
Lexington, KY 40512-4219

The Steam Team, Inc
1904 W. Koeing Lane
Austin, TX 78756-1211

Third Coast Graphics, Inc
110 Del Monte Dr.
Friendswood, TX 77546-4487

Thomas, David
79 Malone Hill Road
Elma, WA 98541-9206

Travelers
PO Box 660317
Dallas, TX 75266-0317

Travis County
PO Box 149328
Austin, TX 78714-9328

Travis County c/o Jason A. Starks
PO Box 1748
Austin, Texas 78767-1748

U.S. Legal Support
PO Box 4772
Houston, TX 77210-4772

Uline Shipping Supply
12575 Uline Drive
Pleasant Prarie, WI 53158-3686

Vazquez, Valdemar Rodriguez
145 Quail Ridge Drive
Kyle TX 78640-9788

Verizon
PO Box 660108
Dallas, TX 75266-0108

Verizon Edgecast
13031 West Jefferson Blvd, Building 900
Los Angeles, CA 90094-7002

Veronique De La Rosa
c/o Chamberlain Hrdlicka
attn: Jarrod B. Martin
1200 Smith, Suite 1400
Houston TX 77002-4496

Vultr
14 Cliffwood Avenue, Suite 300
Matawan, NJ 07747-3931

WMQM-AM 1600
21 Stephen Hill Road
Atoka, TN 38004-7183

WWCR
1300 WWCR Avenue
Nashville, TN 37218-3800

Waste Connections Lone Star, Inc.
PO Box 17608
Austin, TX 78760-7608

Water Event - Pure Water Solutions
1310 Missouri St
South Houston, TX 77587-4537

Watson, Paul
9 Riverdale Road
Ranmoor Sheffield
South Yorkshire S10 3FA
United Kingdom

Westwood One, LLC
3542 Momentum Place
Chicago, IL 60689-5335

William Aldenberg
c/o Ryan Chapple
303 Colorado Street, Ste 2850
Austin, TX 78701-0137

William Sherlach
c/o Ryan Chapple
303 Colorado Stret, Suite 2850
Austin TX 78701-0137

Willow Grove Productions
1810 Rockcliff Road
Austin, TX 78746-1215

Wisconsin Dept of Revenue
Special Procedures Unit
POB 8901
Madison, WI 53708-8901

Wisconsin Dept. of Revenue
PO Box 3028
Milwaukee, WI 53201-3028

Your Promtional Products, LLC
133 North Friendswood STE 186
Friendswood, TX 77546-3746

Zendesk, Inc
989 Market Street
San Francisco, CA 94103-1708

Zoom US
55 Almaden Blvd, 6th Floor
San Jose, CA 95113-1608

eBay
2025 Hamilton Avenue
San Jose, CA 95125-5904

eCommerce CDN, LLC
221 E 63rd Street
Savannah, GA 31405-4226

mongoDB Cloud
1633 Broadway
39th Floor
New York, NY 10019-6757

Alex E Jones
c/o Jordan & Ortiz PC
500 N Shoreline Blvd
Ste 900
Corpus Christi, TX 78401-0658

Christina Walton Stephenson
Crowe & Dunlevy
2525 McKinnon St.
Ste 425
Dallas, TX 75201-1543

David Wheeler, et al.
c/o Cain & Skarnulis PLLC
303 Colorado Street
Suite 2850
Austin, TX 78701-0137

Kyung Shik Lee
Kyung S. Lee PLLC
4723 Oakshire Drive
Apt. B
Houston, TX 77027-5499

Kyung Shik Lee
Shannon & Lee LLP
Pennzoil Place-Suite 1300
HOUSTON, TX 77027 United States

Leonard Pozner
c/o McDowell Hetherington LLP
Attention: Avi Moshenberg
1001 Fannin Street
Suite 2700
Houston, TX 77002-6774

Marcel Fontaine
c/o McDowell Hetherington LLP
Attention: Avi Moshenberg
1001 Fannin
Suite 2700
Houston, TX 77002-6774

Melissa A Haselden
Haselden Farrow PLLC
Pennzoil Place
700 Milam
Suite 1300
Houston, TX 77002-2736

Neil Heslin
c/o McDowell Hetherington LLP
Attention: Avi Moshenberg
1001 Fannin Street
Suite 2700
Houston, TX 77002-6774

R. J. Shannon
Shannon & Lee LLP
700 Milam St., STE 1300
Houston, TX 77002-2736

Raymond William Battaglia
Law Offices of Ray Battaglia, PLLC
66 Granburg Circle
San Antonio, TX 78218-3010

Richard M. Coan
c/o Cain & Skarnulis PLLC
303 Colorado Street
Suite 2850
Austin, TX 78701-0137

Scarlett Lewis
c/o McDowell Hetherington LLP
Attention: Avi Moshenberg
1001 Fannin Street
Suite 2700
Houston, TX 77002-6774

Shelby A Jordan

Veronique De La Rosa
c/o McDowell Hetherington LLP
Attention: Avi Moshenberg
1001 Fannin Street
Suite 2700
Houston, TX 77002-6774

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

De Lage Landen Financial Services, Inc.
1111 Old Eagle School Road
Wayne, PA 190087

(d)Konica Minolta Premier Finance
PO Box 41602
Philadelphia, PA 19101-1602

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)ADP TotalSource, Inc.

(u)Akin Gump Strauss Hauer & Feld LLP

(u)Schwartz Associates, LLC

(u)Schwartz and Associates, LLC

(u)Sweetwater Holdings Group, Inc.

(d)Ally Bank c/o AIS Portfolio Services, LLC
4515 N. Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118-7901

(u)Resistance Manifesto

(u)Charles Charlie Cicack

(u)David Ross Jones

(u)Marc Schwartz

(u)W. Marc Schwartz

End of Label Matrix
Mailable recipients 185
Bypassed recipients 11
Total 196

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: FREE SPEECH SYSTEMS, LLC Debtor.	§ Case No. 22-60043 § § (Chapter 11, Subchapter V) § § JUDGE CHRISTOPHER M. LOPEZ §
--	--

**ORDER GRANTING MOTION OF ALEXANDER E. JONES FOR ENTRY OF AN
ORDER AUTHORIZING ALLOWANCE AND PAYMENT OF ADMINISTRATIVE
EXPENSE PURSUANT TO 11 U.S.C. § 503(B)(1)**

ON THIS DATE this Court considered the *Motion of Alexander E. Jones for Allowance and Payment of Administrative Expense Pursuant to 11 U.S.C. § 503(B)(1)* (the “Motion”) in the above-captioned case.

The Court finds that it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334(b); that this is a core proceeding pursuant to 28 U.S.C. § 157(b), and that the venue of this proceeding in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409. The court has considered the Motion and lack of objections prior to the signing of this order.

Accordingly, **IT IS HEREBY ORDERED THAT:**

1. The Motion is **GRANTED** to the extent set forth herein.
2. Alexander E. Jones (“Jones”) shall be allowed \$680,000.00 as an administrative expense claim (the “Admin Claim”) through May 31, 2023 for contract salary due under his Employment Agreement with Free Speech Systems LLC (“FSS”), and any additional amounts accrued under the Employment Agreement as set forth in the Motion.
3. Having allowed the Admin Claim, and no good cause appearing as to why the Admin Claim should not now be paid in full, it is now ordered that FSS shall pay the amount of

the Admin Claim in at least \$680,000.00 (plus any such other amounts as are determined to have been accrued under the Employment Agreement) to Jones within 5 days of entry of this Order.

4. Notice of the Motion provided by Jones is deemed to be good and sufficient notice of the Motion, and the requirements of the Local Rules are satisfied by the contents of the Motion.

5. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

IT IS FURTHER ORDERED that, notwithstanding any Bankruptcy Rule to the contrary, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

Dated: _____, 2023

CHRISTOPHER M. LOPEZ
UNITED STATES BANKRUPTCY JUDGE